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Comments to:
Final Draft

8 November, 1993

Interim Remedial Action Remedial Investigation/Feasibility Study Project Plan
Operable Unit No. 10, (Site 35 - Camp Geiger Area Fuel Farm)

Provided by: William Mullen
Technical Remedial Manager,
LANTDIV, NAVFACENGCOM

Provided to: Ms. Katherine Landmen
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LANTDIV, NAVFACENGCOM

✓NCP? →

Page 1-2, 1st and 2nd bullets, Petroleum products were exempted from Hazardous Waste by definition. Change word "hazardous" to "toxic" in both sentences. *I think this makes a diff. products are still hazardous substances plus they fail under pollutants, contaminants, and don't we need to preserve wording to conform w/ Interim Action Regs? (UCPS)*

Page 1-2, 2nd bullet, reference to near surface contamination should be better defined. *-OK, I agree to the point of I level more specific w/ or changing sentence wording.*

Page 2-7 refers to the highest level contamination @ 8 feet bgs.

Page 1-2, 2nd bullet, sentence not clearly worded, do the soils migrate or do the contaminants? *OK.*

Page 2-6, Figure 2-4. Delete "0" Contour line. There is no basis to the exact location for this line. The presence of a zero line is based on extremely sparse data points and is not defensible. For site work planning and clarity, replace the "0" with a "1" line. Also, due to the extreme differences in concentrations identified, perhaps log scale contour lines would be more effective in displaying the TPH concentrations within the soils. *OK.*

Page 2-7, Last Paragraph. What analytical method to determine TPH concentrations will be used during this Interim Remedial Action Remedial Investigation/Feasibility Study Project? Method 418.2 is not a preferred method since it only provides total TPH, and a characterization of TPH components is not possible. EPA method 8015 or equivalent is preferred. *OK.*

Page 3-3, first full sentence on page. If chlorinated solvents have been identified in ground water at site, and are potential soil contaminants at this site the reliance on visual classification of contamination as a screening tool is not acceptable. Soils heavily contaminated with petroleum products may mask the presence of chlorinated solvents, and certainly *may* have no relation to the presence of metals within the soils.

Since there is no information regarding the presence of chlorinate solvents or metals in the soil to date, use of visual contamination characteristics will not insure adequate analytical information is collected to provide an adequate remediation design. *not true, DON'T think.*
Therefore, it is recommended that at several soil boring locations, all soil samples collected be analyzed to vertically characterize all contamination present. These

locations should be, at a minimum, within the highest areas of previously identified contamination and at the furthest "up and down gradient" locations of sampling.

*faxed 11/8/93
2:15pm*

**Atlantic Division
Naval Facilities Engineering Command
Environmental Quality Division**

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TOTAL # OF PAGES: 3

DATE: 08 November 1993

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REMARKS: Camp Lejeune, OU #10 (Site 35) Draft Final Interim RI/FS Project Plans

Dan,

Attached are comments on the Draft Final Interim RI/FS for Site 35 from our staff geologist, Bill Mullen. Please provide responses to these comments (an informal fax is fine). If you have questions on these comments, you may call Bill directly at (804) 322-4790.

I spoke to Gena Townsend this morning, and she says that she has no further comments on the Interim project plans. She is faxing me a letter today that states this.

Thanks,

Kak